From: "Eron Dodak" <edodak@integral-corp.com>
To: "Novak, Madi" <Novak.Elisabeth@epa.gov>

CC: "Michael PINTO" <michael.pinto@totalenergies.com>

Date: 12/8/2021 9:56:06 AM

Subject: RE: Step outs

Hi Madi,

This is very helpful. Thanks we will get the FCR to you as soon as possible.

ERON DODAK | Senior Consultant

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From: Novak, Madi <Novak.Elisabeth@epa.gov> Sent: Wednesday, December 8, 2021 8:57 AM To: Eron Dodak <edodak@integral-corp.com>

Cc: Michael PINTO <michael.pinto@totalenergies.com>

Subject: Step outs

[CAUTION: External email. Think before you click links or open attachments.]

Hi Eron,

As discussed yesterday evening I took a look at some of the approved language regarding step outs for nearby project areas in case it is useful as you develop an FCR. Please see below relevant language and let me know if you have any questions. Thank you.

Text from Bayer PDI W

Contingency planning for impediments to core advancement will be consistent with Section 4.3.2 of the Pre-RD Group's Subsurface Sediment FSP (AECOM and Geosyntec 2018b) that is:

- If the first core attempt meets the acceptance criteria, then no additional cores will be collected at that station. If not, then up to two additional cores will be attempted and retained (stored on vessel deck). The best (percent recovery) of three attempts will be retained and processed.
- If acceptable core cannot be obtained after three attempts within a 25-foot radius of the planned sample location, the field crew will step out up to a 50-foot radius for a total of three additional sampling attempts.
- If acceptable core cannot be obtained within a 50-foot radius of the planned location after three attempts, the
 Field Coordinator will confer with the PDI Project Coordinator and a field change request form will be submitted to
 EPA. EPA must approve any modifications to the sample location or sampling methods prior to implementing
 changes in the field. The field crew will move to another sample location while an alternate location or other
 options are being identified.
- If recovery is exceptionally poor for all three additional 50-foot radius attempts (< 50% recovery), then the best
 core recovery will be capped and archived at the Sample Processing Facility following discussions with the PDI
 Project Coordinator and EPA. Lower acceptance criteria may be allowed and documented based onfield

 judgement, or the location may be abandoned until further discussions with the PDI Project Coordinator and EPA are conducted.

Text from Gasco Data Gasps WP

If multiple core rejections (three attempts) occur within a 20-foot radius of the planned location, the core with the best recovery will be deemed acceptable and processed. If moving a core location (location X) due to refusal, low recovery, or obstruction results in that location being collected within 50 feet of another proposed core location (location Y), then the second proposed location (location Y) may not be collected. In some of the proposed nearshore locations, the cores may need to be relocated further channelward if riprap is encountered on the mudline that prevents adequate core recovery.

Willamette Cove PDI WP

The field crews will strive to achieve a minimum 80 percent sample recovery using various methodologies; however, for the purposes of this investigation, 70 percent sample recovery will be

considered acceptable. At stations where 70 percent sample recovery cannot be achieved after three attempts (within 50 ft of the proposed target sample location), the FD will confer with the PM

and EPA to determine the appropriate next steps. This may include abandonment of the sampling station, relocating to an alternative station, or potentially processing a core with a lower sample

recovery percentage. EPA will be kept informed of any issues associated with sample recovery during the field investigation.

Madi Novak, Remedial Project Manager
EPA Region 10, Superfund & Emergency Management Division
Oregon Operations Office

(b)(6) (C) She/Her